

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 08-_____
	:	
v.	:	DATE FILED:
	:	
TINA D. HOWARD	:	VIOLATION:
	:	18 U.S.C. § 641 (conversion of government
	:	funds – 3 counts)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Social Security Administration (“SSA”), an agency of the United States, administered certain government benefit programs, including the Supplemental Security Income (“SSI”) program, pursuant to Title 42, United States Code, Sections 1381-1383f.
2. The SSI program, which was funded through general tax revenues of the United States, provided monthly cash benefits to individuals who were age sixty-five or over, or who were “disabled” and who demonstrated financial need, as determined by his or her “income” and “resources,” as those terms were defined for purposes of the Social Security Act.
3. The grandmother of defendant TINA D. HOWARD, Syrena Howard, received SSI benefits during her lifetime. The SSA mailed Syrena Howard’s SSI payments to her address of record.
4. Syrena Howard died on April 5, 2001.

5. The SSA was not timely notified of Syrena Howard's death. Unaware that Syrena Howard had died, the SSA continued to issue and mail monthly SSI checks to Syrena Howard, which defendant TINA D. HOWARD knowingly and willfully converted to her own use.

6. In or about August 2006, more than five years after the fact, the SSA learned that Syrena Howard had died, and terminated her SSI payments.

7. Beginning in or about April 2001 and continuing through in or about August 2006, in the Eastern District of Pennsylvania, defendant

TINA D. HOWARD

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$30,017.60 in Social Security disability benefits, which were intended for Syrena Howard, who was deceased, and which defendant HOWARD knew she was not entitled to receive.

In violation of Title 18, United States Code, Section 641.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this information:

1. Paragraphs one through six of Count One are incorporated by reference.
2. The United States Department of Agriculture (“USDA”), an agency of the United States, funded certain government benefit programs, including the Food Stamp Program (“FSP”) and the Cash Assistance Program (“CAP”). The mission of the FSP was to provide low-income children and families with access to nutritious food by providing them with government funds to purchase food. The mission of the CAP was to provide eligible recipients with monthly cash benefits with no restrictions as to how the cash could be used. In Pennsylvania, the FSP and CAP programs were administered by the Pennsylvania Department of Public Welfare (“DPW”) through county assistance offices located in various parts of the state, including in Philadelphia.
3. Prospective recipients of assistance from the FSP and CAP were required to submit an application which truthfully and accurately identified all of their sources of income. This was required to assure that only low-income individuals received these benefits. Individuals with income or assets in excess of limits set by the USDA and DPW were not eligible to receive such benefits. In addition, to make sure that the individuals retained their eligibility, recipients of FSP and CAP benefits were required to periodically submit to the DPW a report which detailed their sources of income and other financial information.
4. In her application for FSP and CAP benefits, defendant TINA D. HOWARD falsely stated that she had no income, falsely stated that she had no other type of resource, and falsely stated that she had no expectation of money or receiving any money or

other type of resource. As defendant knew, however, by virtue of her unreported income for the period April 2001 through August 2006 as charged in Count One of this information, neither she nor anyone in her household was eligible to participate in the FSP and CAP. To obtain benefits to which she was not entitled, defendant caused to be submitted numerous false applications for benefits, false monthly reports, and false semi-annual reports which substantially understated her income and resources.

5. As a result of defendant TINA D. HOWARD's misrepresentations and omissions regarding her income and resources, defendant received approximately \$12,646.00 in FSP benefits and \$23,259.00 in CAP benefits to which she knew she was not entitled.

6. Beginning in or about April 2001 and continuing through in or about August 2006, in the Eastern District of Pennsylvania, defendant

TINA D. HOWARD

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$35,905.00 in FSP and CAP benefits, which were funded by the United States Department of Agriculture, and which defendant HOWARD knew she was not entitled to receive.

In violation of Title 18, United States Code, Section 641.

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

At all times material to this information:

1. Paragraphs one through six of Count One and paragraphs one through five of Count Two are incorporated by reference.

2. The United States Department of Health and Human Services (“HHS”), an agency of the United States, funded certain government benefit programs, including the Medical Assistance Program (“MAP”). The mission of the MAP was to provide health care services to low-income individuals with high medical expenses by providing government funds to pay for medical expenses. In Pennsylvania, the DPW administered the program through county assistance offices located in various parts of the state, including in Philadelphia.

3. Prospective recipients of assistance from the MAP were required to submit an application which truthfully and accurately identified all of their sources of income. This was required to assure that only low-income individuals received these benefits. Individuals with income or assets in excess of limits set by the HHS and DPW were not eligible to receive MAP benefits. In addition, to make sure that the individuals retained their eligibility, recipients of MAP benefits were required to submit to periodically submit to the DPW a report which detailed their sources of income and other financial information.

4. In her applications for MAP benefits, defendant TINA D. HOWARD falsely stated that she had no income, falsely stated that she had no other type of resource, and falsely stated that she had no expectation of money or receiving any money or other type of resource. As defendant knew, however, by virtue of her unreported income for the period April 2001 through August 2006 as charged in Count One of this information, neither she nor anyone

in her household was eligible to participate in the MAP. To obtain benefits to which she was not entitled, defendant caused to be submitted numerous false applications for benefits, false monthly reports, and false semi-annual reports which substantially understated her income and resources.

5. As a result of defendant TINA D. HOWARD's misrepresentations and omissions regarding her income and resources, defendant received approximately \$33,874 in MAP benefits to which she knew she was not entitled.

6. Beginning in or about April 2001 and continuing through in or about August 2006, in the Eastern District of Pennsylvania, defendant

TINA D. HOWARD

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$33,874.60 in MAP benefits, which were funded by the United States Department of Health and Human Services, and which defendant HOWARD knew she was not entitled to receive.

In violation of Title 18, United States Code, Section 641.

PATRICK L. MEEHAN
UNITED STATES ATTORNEY